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7 Attorneys for Defendants  
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HITACHI ELECTRONIC DEVICES (USA), INC.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

14 IN RE: TFT-LCD (FLAT PANEL)  
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI  
MDL No. 1827

15 This Document Relates To:

Case No. 09-cv-5609 SI

17 NOKIA CORPORATION and  
18 NOKIA, INC.,

19 Plaintiffs,

V

AU Optronics Corporation, et al.

## Defendants.

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**STIPULATION AND [PROPOSED]  
ORDER MODIFYING DEADLINE  
FOR FILING OF MOTION TO  
COMPEL**

1 Plaintiffs Nokia Corporation and Nokia, Inc. (collectively, "Nokia") and Defendants  
2 Hitachi, Ltd. and Hitachi Displays, Ltd. (collectively, the "Hitachi Defendants") hereby  
3 stipulate as follows:

4 **STIPULATION**

5 WHEREAS discovery closed in this case on December 8, 2011, as set forth in the  
6 Stipulation and Order Modifying Pretrial Schedule for "Track One" Direct Action Plaintiff  
7 and State Attorney General Actions (Dkt. No. 3110, the "Scheduling Order");

8 WHEREAS Nokia served its First Set of Requests for Admission ("Requests") to  
9 the Hitachi Defendants on November 8, 2011;

10 WHEREAS the Court has entered an Order extending the close of fact discovery set  
11 forth in the Scheduling Order for the limited purpose of allowing the Hitachi Defendants  
12 respond to Nokia's First Set of Requests for Admission to December 23, 2011 (Dkt. No.  
13 4357);

14 WHEREAS the Hitachi Defendants served responses to Nokia's First Set of  
15 Requests for Admission on December 23, 2011.

16 WHEREAS, the Court has entered an Order extending the time for the filing of  
17 motions to compel as to Nokia's and defendants' remaining discovery responses to January  
18 13, 2012 (Dkt. 4387);

19 WHEREAS, Nokia and the Hitachi defendants are continuing to meet and confer  
20 regarding Hitachi Defendants' response to Nokia's First Set of Requests for Admission.

21 WHEREAS, Nokia and the Hitachi defendants hope to resolve these issues  
22 informally, without the need to file a motion to compel and seek the Court's involvement;

23 WHEREAS in an effort to facilitate the informal resolution of these issues, Nokia  
24 and the Hitachi Defendants wish to extend the deadline to file any motion to compel with  
25 respect to the Hitachi Defendants' response to Nokia's First Set of Requests for Admission  
26 through February 1, 2012.

27 NOW, THEREFORE, Nokia and the Hitachi defendants, through their undersigned  
28 respective counsel, stipulate and agree as follows:

1           The deadline for Nokia to file any motion to compel with respect to the Hitachi  
2 Defendants' responses to Nokia's First Set of Requests for Admission is extended through  
3 and including February 1, 2012.

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5   DATED: January 13, 2012.

/s/ Kent M. Roger

6           Kent M. Roger (CA Bar No. 95987)  
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*Counsel for Defendants Hitachi, Ltd., Hitachi Displays,  
Ltd. and Hitachi Electronic Devices (USA), Inc.*

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**IT IS SO ORDERED.**

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Dated Entered: 1/18/12



The Honorable Susan Illston  
District Court Judge

**ATTESTATION:** Pursuant to N.D. Cal. General Order 45, Part X-B, the filer attests that  
concurrence in the filing of this document has been obtained from each signatory hereto.